

NOV 25 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorney for Defendant

IN THE DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

ABELLANOSA, JOANNA, et. al.,

Plaintiffs,

vs.

L & T INTERNATIONAL CORPORATION.

Defendant.

Civil Action No. 05-0010

DEFENDANT'S CASE
MANAGEMENT CONFERENCE
STATEMENT PURSUANT
TO LR 16.2CJ.e2

Date : November 25, 2005

Time : 9:30 a. m.

Judge : Hon. Alex R. Munson

Defendant, through counsel, hereby requests leave of Court to submit their Case Management Conference Statement as required by Local 16.2CJ.e2 out of time, as follows:

A. **Service of process on parties not yet served.** Defendant L&T International Corporation was served.

B. **Jurisdiction and Venue.** The Court has jurisdiction over this case and this matter has been properly brought before it based on the current state of the pleadings.

C. **Track Assignment.** This case should be assigned to the Complex Track based of the factors listed in Local Rule 16.2CJ(c)(2)(c).

D. **Anticipated motions.** Defendant anticipates filing motions for summary judgment/partial summary judgment.

E. Anticipated discovery or remaining discovery, including limitation on discovery.

The Parties have yet to conduct any discovery. The discovery demands in this case are extensive given the number of parties and claims.

F. **Appropriateness of especial procedures such as consolidation of actions for discovery or pre-trial, reference to a master or to arbitration or to the Judicial Panel or Multidistrict Litigation, or application of the Manual for Complex Litigation.** The manual for complex litigation may have some applications in this case.

G. **Modifications of the standard pre-trial procedures specified by this Plan on account if the relative simplicity or complexity of the action or proceeding.** Depending on the track to which this case is assigned, modifications to the pre-trial procedures may become necessary in order to allow the defendant sufficient opportunity to conduct discovery in advance of the deadline for filing of dispositive motions.

H. **Settlement prospects.** No settlement discussion has been undertaken. Defendant is amenable to settlement.

I. **Ay other matter which may be conducive to the just, efficient, and economical determination of the proceeding, including the definition or limitation of issues.** At this time, Defendant has identified no such matters.

Dated this 25th day of November 2005.

COLIN M. THOMPSON, ESQ.
Attorney for L&T International Corporation